



November 27, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

Chairman
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai:

We write to support the Comments of Massachusetts Community Media, Inc. (MassAccess) and to disapprove of the proposals and tentative conclusions set forth in the FCC's September 25 Further Notice of Proposed Rule Making in *Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992*, MB Docket 05-311.

Marshfield Community Television is a 501c3 Community Media Center serving the town of Marshfield Massachusetts. MCTV has over sixty members who come from all walks of life who produced content that highlight the community in which they live. We have five full time employees, two college interns, four high school interns and a five person Board of Directors made up of community leaders.

In addition to content produced by our members we produce content spotlighting local and state Government, our school system and its programs and activities and content spotlighting the community.

We agree with the comments filed by MassAccess in that:

- The FCC lacks authority to impair private franchise contracts
- Section 622 of the Cable Act defines "Franchise Fees" and the FCC has no right to redefine
- Any attempt to redefine "Franchise Fees" weakens the authority of local municipalities
- The rulemaking invents "Cable-Related In-kind Contributions and "Fair Market Valuation" where there is no precedent
- Section 622 of the Cable Act states that "[a]ny Federal agency may not regulate the amount of the franchise fees paid by a cable operator."

Community media stations allow the residents of Marshfield Massachusetts to watch and create uniquely local programming about their community and local events and issues of

interest to them. Such was the intent of the PEG provisions of the 1984 Cable Act – to enhance local voices, serve local community needs and interests, and strengthen our local democracy. By defining “franchise fee” in an overly broad fashion to include “in-kind” support, the FCC’s proposals will shift the fair balance between cable franchising authorities and cable operators and will force communities to choose between franchise fees and PEG channels, – something that was never the intent of the Act.

We appreciate your consideration and hope you will protect PEG channels in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

The Staff of Marshfield Community Television

Jonathan Grabowski - Executive Director

Jennifer Palmer – Production Manager

Sean Leary – Government & Programming Coordinator

Desmond O’Neill – Production Assistant

Kayla MacDonald – Membership & Outreach Coordinator